

# **EXHIBIT K**

◀ Sue Powers

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**From:** Joseph Solano  
**Sent:** Monday, May 01, 2017 10:22 AM  
**To:** Sue Powers  
**Subject:** Fwd: Harassment

Sent from my iPhone

Begin forwarded message:

**From:** Alan Geller <[AGeller@vwprinceton.com](mailto:AGeller@vwprinceton.com)>  
**Date:** April 28, 2017 at 9:33:06 PM EDT  
**To:** Joseph Solano <[JSolano@audiprinceton.com](mailto:JSolano@audiprinceton.com)>  
**Cc:** Alan Geller <[AGeller@vwprinceton.com](mailto:AGeller@vwprinceton.com)>  
**Subject:** Re: Harassment

Hi Joe,

Hope all is well.

I have a sensitive topic that I'd like to bring to your attention and it's been weighing more and more heavily on my mind since it was mandatory for everyone at the dealership to sign up for and sit through an employee harassment presentation a few months ago.

The primary harassment related issues that I've had over the past year is with George Stamos who to my knowledge is one of my two managers at the dealership.

Since I've joined I've had to put up with the following from George:

1. Using slang and code words to describe members of a certain ethnic origin.

2. My wife is Chinese. George believes that it's amusing when asians come to the dealership to call them my "relatives."

3. If I ask George to have more than one car priced for a customer he gives me a hard time and says that I'm not doing my job in terms of consulting with the customer on "vehicle selection." I'm not sure what the problem is because some customers like to shop and price out more than one vehicle, and George seems to want to blame me for this behavior. Of course if it's a customer referred by you or Jonathan Sobel and those individuals want more than one car priced, that's fine - but not your average customer who walks in the door.

4. Perhaps more importantly, unlike Abe, George NEVER comes out of his office to help me to close a customer. When he desks my deals, if Abe isn't around, I'm alone without support. In fact, I can't see how without Abe around any new salesperson could get up and running at the dealership if they purely had to rely on George as their manager.

5. On more than one occasion (including this week) he's called me a "weak salesman" with his office door wide open. This isn't a private conversation - in fact we've never had a private conversation. When he calls me a weak salesman any VW, Audi and/or customer in the showroom can hear him. - This week a customer had her mechanic look at a pre-owned vehicle that she wanted to buy and felt that the vehicle's rotors needed to be cut. Because I couldn't get her to disregard her 20 year relationship with her mechanic and instantly buy from me, I'm a "weak salesman" in George's estimation.

Continuing with him calling me weak, on another occasion a few customers in succession saw that VW was offering special financing on CPO vehicles on the VW.com Website. When I told George that the customers were expecting to qualify for the special rate given their credit histories he called me a "weak" something or other.

6. He has little sense of professional decorum. When he wants to speak with someone in the showroom he yells their name from his office without checking to see whether they're available. If he doesn't get an instant response he keeps yelling for them until he does. He doesn't walk out of his office to look, nor does he call anyone at their extension and leave a message to see him when they have a minute. Once when he asked me to drop what I was doing and I told him that I needed a minute he embarrassed me in front of the other employees saying that he doesn't care what I'm doing and that I needed to drop everything for him to tell us all in a huddle in the middle of the showroom that everyone in the dealership had to stop using all social media immediately.

7. Also in terms of professional decorum he speaks behind the back of those not present. I think that Abe is a wonderful manager and human being and take particular offense at George or anyone else speaking negatively about Abe and how he manages things when Abe's not there to explain or defend his actions. On more than one occasion George wanted me to work around Abe due to the fact that he felt that Abe was incompetent and doesn't do things exactly the way that George does.

- 8. Perhaps worst of all Joe, when a customer has an issue with a certified preowned vehicle such as a scratch on the car's surface, lights that go off when they put the keys in the ignition, a dead battery that need to be replaced a day or two after a customer purchases a preowned vehicle, etc., instead of trying to resolve the issue and create a satisfied customer his response is to absolve himself of all responsibility, look me in the eye and yell:"What do you want me to do? I can't do anything. Tell them to buy a new car." This leaves me in the position of either alienating the customer OR more likely I have to go around George to see if Abe will assist with the situation (thank goodness Abe always helps and things typically get worked out with no hard feelings).

I'm at the point where I don't want to have George desk my deals (an impossibility on Thursday's - Abe's day off) or approach George for anything that would require a manager's or supervisor's input.

As we haven't had a chance to have this type of discussion Joe, I wanted to put my thoughts and feelings in writing. I hope that you understand.

I also hope that you can understand that if I leave the dealership due to this sort of continued behavior from George that I will likely seek legal counsel for the harassment that I've taken from him this past year.

I hope that we can discuss this when you have a moment in private.

Regards,

Alan Geller

Sales & Leasing Specialist

Volkswagen Princeton

Office: 609-423-2754

Cell: 917-744-6668

[ageller@vwprinceton.com](mailto:ageller@vwprinceton.com)

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